

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND, NORTHERN DIVISION**

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION,	:	
	:	
	:	
Plaintiff,	:	
	:	
and	:	
	:	CASE NO.: WDQ 02-CV-648
KATHY KOCH,	:	
	:	
Intervenor/Plaintiff,	:	JURY DEMANDED
	:	
v.	:	
	:	
LA WEIGHT LOSS CENTERS, INC.,	:	
	:	
Defendant.	:	

JOINT MOTION TO EXTEND EXPERT DISCOVERY AND MODIFY SCHEDULE

Pursuant to the Federal Rules of Civil Procedure, Rule 105 of the Local Rules of the United States District Court for the District of Maryland, the Court's October 2, 2006, Letter Order and May 25, 2004, Order Regarding Bifurcation and Scheduling (the "Order"), plaintiff EEOC and defendant LA Weight Loss Centers, Inc. (the "Parties") respectfully request that the Court enter a limited order extending the Parties' time for expert discovery and adjusting the deadlines for dispositive motions accordingly. The issues giving rise to the Parties' request are: (1) the large volume and complexity of expert discovery in this matter; (2) the number of expert reports at issue, which total ten including rebuttal and supplemental reports; (3) the large number of expert depositions; and (4) the holiday and vacation schedules of the Parties' expert witnesses.

Accordingly, the Parties request that the Order be modified as follows: (1) all expert depositions and other discovery shall conclude on or before February 9, 2007; (2) the Parties' Rule 26(e) disclosures shall be submitted on or before February 14, 2007; (3) dispositive motions with respect to Stage I issues shall be filed on or before March 9, 2007; and (4) EEOC shall file its opposition and cross motion, if any, on or before April 6, 2007.

/s/

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/s/

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